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5 Attorney for Defendant  
6 JOSE LUIS RAMOS

7  
8 IN THE UNITED STATES DISTRICT COURT  
9  
FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-00225-WBS  
11 Plaintiff, )  
12 vs. ) STIPULATION FOR MODIFICATION OF  
JOSE LUIS RAMOS, ) CONDITIONS OF PRETRIAL RELEASE;  
13 ) [PROPOSED] ORDER  
Defendant. )  
14 ) Hon. Jeremy D. Peterson  
15 \_\_\_\_\_)

16 The defendant, JOSE LUIS RAMOS, by and through his attorney of record, Assistant  
17 Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of  
18 record, Cameron Desmond, hereby stipulate to and request an order from this Court modifying  
19 the conditions of Mr. Ramos' pretrial release to extend the curfew hours for employment  
20 purposes. The proposed amended special conditions of pretrial release file with this stipulation  
21 as Exhibit A include the requested amendment to Special Condition 14: extending the non-  
22 curfew hours by one hour in the morning and one hour in the evening.

23 Mr. Ramos has been on pretrial release in this district since December 2022, on a \$50,000  
24 unsecured appearance bond. *See* Dkt. 82. Mr. Ramos is in compliance with all of his conditions  
25 of release. One of those conditions of release is location monitoring. Mr. Ramos is currently  
26 subject to a curfew between the hours of 8:00 p.m. and 6:00 a.m., and therefore must remain  
27 inside his residence during that time except for pre-approved employment; education; religious  
28 services; medical, substance abuse, or mental health treatment; attorney visits; court

1 appearances; court ordered obligations; or other activities authorized by the pretrial services  
2 officer.

3 Mr. Ramos's is currently employed through a local union and anticipates needing an  
4 extension of his curfew hours to accommodate an earlier start time and later workday end time  
5 depending on the nature of his work assignments, which vary. In light of Mr. Ramos' history of  
6 compliance with all of his conditions and the reduced assessment of flight risk and/or danger in  
7 this case, the parties request that **Special Condition 14 be modified to a curfew from 9:00 p.m.**  
8 **to 5:00 a.m., daily.** The parties do not request a hearing in this matter in light of this stipulation.  
9

10 Respectfully submitted,

11 DATED: March 3, 2023

12 HEATHER E. WILLIAMS  
Federal Defender

13 */s/ Megan T. Hopkins*  
14 MEGAN T. HOPKINS  
15 Assistant Federal Defender  
16 Attorney for JOSE LUIS RAMOS

17 DATED: March 3, 2023

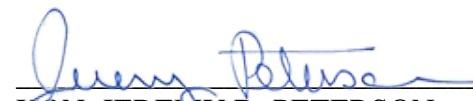
18 PHILLIP A. TALBERT  
United States Attorney

19 */s/ Cameron Desmond*  
20 CAMERON DESMOND  
21 Assistant United States Attorney  
22 Attorney for the United States

1                   **[PROPOSED] ORDER**

2                   GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT the  
3 Amended Special Conditions of Release for defendant, Jose Luis Ramos, are hereby adopted.  
4 Special Condition 14 shall be modified to reflect that Mr. Ramos shall be subject to a curfew  
5 from 9:00 p.m. to 5:00 a.m., daily. All other conditions of pretrial release shall remain in force.

6  
7 DATED: March 3, 2023

8                     
9                   HON. JEREMY D. PETERSON  
United States Magistrate Judge

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